

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL LEAGUE  
PLAYERS' CONCUSSION INJURY  
LITIGATION

No. 2:12-md-02323-AB  
MDL No. 2323

THIS DOCUMENT RELATES TO:  
THOSE FILING MOTIONS TO REMAND,  
AS SHOWN IN ATTACHMENT A TO  
RIDDELL'S CONSOLIDATED BRIEF IN  
OPPOSITION TO VARIOUS MOVANTS'  
MOTIONS TO REMAND

**Hon. Anita B. Brody**

**RIDDELL DEFENDANTS'<sup>1</sup> NOTICE OF CORRECTION TO CONSOLIDATED BRIEF  
IN OPPOSITION TO VARIOUS MOVANTS' MOTIONS TO REMAND (ECF NO. 9572)**

The Riddell defendants respectfully notify the Court and the parties of a correction to their consolidated brief in support of their opposition to various movants' motions to remand (ECF No. 9572) due to a scrivener error made in that filing.

Specifically, on page 17 of that filing, the Riddell defendants stated as follows:

In addition, like their Girardi and Cohen counterparts, there are improprieties within the Corboy movants as well. For example, two of them (Cornell and DeLeone) named Riddell in an original complaint, but never filed a *SAMAC-SFC* pursuant to CMO-4, thereby abandoning their claims.

(ECF No. 9572 at 17 (emphasis added).)

The intent was for the italicized reference to be to certain plaintiffs not filing a "SFC" (consistent with the reference to CMO-4), not "SAMAC-SFC" (as that term was defined in the

---

<sup>1</sup> For convenience only, "the Riddell defendants" refers collectively to the following defendants: Riddell, Inc., All American Sports Corporation, Riddell Sports Group, Inc., BRG Sports, Inc. (f/k/a Easton-Bell Sports, Inc.), BRG Sports, LLC (f/k/a Easton-Bell Sports, LLC), EB Sports Corp., and BRG Sports Holdings Corp. (f/k/a RBG Holdings Corp.). The plaintiffs have amended the case style to reflect the new entity names for the entities previously known as Easton-Bell Sports, Inc. and Easton-Bell Sports, LLC. The plaintiffs also, in what appears to be a typographical error, refer to the "formerly known as" entity for BRG Sports Holdings Corp. as "BRG Holdings Corp." The former entity name was actually RBG Holdings Corp. Riddell has no objection to amending the case style to reflect the new entity names identified in this footnote.

Riddell defendants' opposition to the motions to remand). Therefore, the statement quoted above should read instead (with emphasis added on the corrected portion):

In addition, like their Girardi and Cohen counterparts, there are improprieties within the Corboy movants as well. For example, two of them (Cornell and DeLeone) named Riddell in an original complaint, but never filed a *SFC* pursuant to CMO-4, thereby abandoning their claims.

For these reasons, the Riddell defendants submit this notice to correct the statement made in their opposition to the motions to remand (ECF No. 9572).

Dated: February 16, 2018

Respectfully submitted,

/s/ Paul G. Cereghini

Paul G. Cereghini  
Thomas C. Howard  
BOWMAN AND BROOKE LLP  
2901 N. Central Avenue, Suite 1600  
Phoenix, AZ 85012  
Telephone: (602) 643-2300  
Facsimile: (602) 248-0947  
paul.cereghini@bowmanandbrooke.com  
thomas.howard@bowmanandbrooke.com

Robert L. Wise  
Eden M. Darrell  
BOWMAN AND BROOKE LLP  
901 East Byrd Street, Suite 1650  
Richmond, VA 23219  
Telephone: (804) 649-8200  
Facsimile: (804) 649-1762  
rob.wise@bowmanandbrooke.com  
eden.darrell@bowmanandbrooke.com

Thomas P. Wagner  
MARSHALL DENNEHEY WARNER  
COLEMAN & GOGGIN  
2000 Market Street, Suite 2300  
Philadelphia, PA 19103  
Telephone: (215) 575-4562  
Facsimile: (215) 575-0856  
tpwagner@mdwgcg.com

Attorneys for Defendants

**CERTIFICATE OF SERVICE**

The undersigned certifies that on February 16, 2018, the foregoing was electronically filed and served via ECF on all counsel of record registered to receive service via the Court's CM/ECF system.

/s/ Paul G. Cereghini